

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term
Grand Jury Sworn in on May 21, 2014**

UNITED STATES OF AMERICA

v.

**KRAL HAVACILIK IC VE DIS
TICARET SIRKETI,
d/b/a KRAL AVIATION,**

**PEYMAN AMIRI LARIJANI,
also known as:
PAYMEN LARIJANI,**

Defendants.

CRIMINAL NO.

Grand Jury Original

VIOLATIONS:

**18 U.S.C. § 371
(Conspiracy)**

**50 U.S.C. § 1705
(International Emergency Economic
Powers Act Violations)**

**31 C.F.R. Part 560
(Iranian Transaction Regulations)**

**15 C.F.R. Parts 730-774
(Export Administration
Regulations)**

**18 U.S.C. § 1956
(Money Laundering)**

**18 U.S.C. § 2
(Aiding and Abetting)**

18 U.S.C. § 981(a)(1)(C)

28 U.S.C. § 2461(c)

18 U.S.C. § 982(a)(1)

**21 U.S.C. § 853(p)
(Criminal Forfeiture)**

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy)

At all times material to this Indictment:

A. Introduction

The Defendants

1. Defendant **KRAL HAVACILIK IC VE DIS TICARET SIRKETI**, doing business as **KRAL AVIATION**, was a company which brokered aircraft parts and related goods on behalf of foreign customers. Defendant **KRAL AVIATION** was registered in the Republic of Turkey with a mailing address of Florya Senlikkoy Mh. Gumus Sk. Sırlın Vliia No: 3/1, 1 Bakukoy-Istanbul, Turkey.

2. Defendant **PEYMAN AMIRI LARIJANI**, also known as **PAYMEN LARIJANI**, is a citizen of Iran and resident of Turkey. Defendant **PEYMAN AMIRI LARIJANI** was the operations manager of Defendant **KRAL AVIATION**. As part of his responsibilities, Defendant **PEYMAN AMIRI LARIJANI** procured aircraft parts and related goods for foreign customers.

The Iran Trade Embargo and the Iranian Transactions Regulations

3. The International Emergency Economic Powers Act (“IEEPA”), 50 U.S.C. §§ 1701-1706, authorizes the President of the United States (“the President”) to impose economic sanctions on a foreign country in response to an unusual or extraordinary threat to the national security, foreign policy or economy of the United States when the President declares a national emergency with respect to that threat.

4. On March 15, 1995, the President issued Executive Order No. 12957, finding that “the actions and policies of the Government of Iran constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States” and declaring “a national emergency to deal with that threat.” Executive Order No. 12957,

as expanded and continued by Executive Orders Nos. 12959 and 13059, was in effect at all times relevant to this Indictment.

5. Executive Orders Nos. 12959 and 13059 (collectively, with Executive Order No. 12957, “Executive Orders”) imposed economic sanctions, including a trade embargo, on Iran. The Executive Orders prohibited, among other things, the exportation, re-exportation, sale, or supply, directly or indirectly, to Iran of any goods, technology, or services from the United States or by a United States person. The Executive Orders also prohibited any transaction by any United States person or within the United States that evaded or avoided, or had the purpose of evading or avoiding, any prohibition set forth in the Executive Orders.

6. The Executive Orders authorized the United States Secretary of the Treasury, in consultation with the United States Secretary of State, “to take such actions, including the promulgation of rules and regulations, as may be necessary to carry out the purposes” of the Executive Orders. Pursuant to this authority, the Secretary of the Treasury promulgated the Iranian Transactions Regulations (“ITR”), 31 C.F.R. Part 560, implementing the sanctions imposed by the Executive Orders.

7. The ITR prohibit, among other things, the export, re-export, sale, or supply, directly or indirectly, of any goods, technology, or services from the United States or by a United States person, wherever located, to Iran or the Government of Iran, without prior authorization or license from the United States Department of the Treasury, through the Office of Foreign Assets Control, located in the District of Columbia. These regulations further prohibit any transactions that evade or avoid or have the purpose of evading or avoiding any of the prohibitions contained in the ITR, including the unauthorized exportation of goods from the United States to a third country if the goods are intended or destined for Iran.

8. The Office of Foreign Assets Control ("OFAC") of the U.S. Department of the Treasury administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them.

9. The Executive Orders and the Iranian Transactions Regulations were in effect at all times relevant to this Indictment.

The Export Administration Regulations

10. The United States Department of Commerce, located in the District of Columbia, was responsible for reviewing and controlling the export of certain goods and technologies from the United States to foreign countries. The Export Administration Act ("EAA"), 50 U.S.C. App. §§ 2101-2420, authorized the Department of Commerce to prohibit or curtail the export of any goods and technology as necessary, to protect, among other things, the national security and foreign policy of the United States. The Department of Commerce implemented that authority through the Export Administration Regulations ("EAR"), 15 C.F.R. Parts 730-774. Although the EAA had lapsed, the EAR continued to be in effect under the provisions of IEEPA by virtue of Executive Order 13222 (August 17, 2001), as extended by successive Presidential notices, the

most recent being August 7, 2014.

11. The EAR regulates the export of all “dual use” items, that is, items that have both a commercial application and a military or strategic use. *See* 15 C.F.R. 730.3. The EAR limits the export of goods and technology that could enhance foreign military capabilities, jeopardize U.S. national security, or undermine U.S. foreign policy goals. The EAR places requirements on exporters and includes a list of products, commodities and items for which an export license is required. *See* 15 C.F.R. § 744.

12. The EAR expressly requires a license applicant to disclose the names and addresses of all parties to a transaction, including the applicant, purchaser, intermediate consignee(s) (if any), ultimate consignee, destination country, end-user of the item, and intended use for the item. Certain applications must be supported by documents designed to elicit information concerning the disposition of the items intended for export. 15 C.F.R. § 748.

13. The Commerce Department’s Bureau of Industry and Security (“BIS”) published a list of restricted entities (the “Entity List”) found in Supplement No. 4 to Part 744 of the EAR. Foreign persons and businesses were placed on the Entity List because they engaged in activities contrary to the United States national security and foreign policy interests, among other reasons. Individuals and companies on the Entity list were ineligible to receive U.S. exported goods subject to the EAR without issuance of a valid Commerce Department export license to the extent specified in Supplement No. 4 to Part 744 of the EAR.

14. The EAR makes it unlawful to attempt conduct prohibited by, or contrary to, or refrain from engaging in any conduct required by, the EAR. It is also unlawful to violate any order, license or authorization issued thereunder; to cause, aid, abet, solicit, attempt, or conspire to commit a violation of the EAR, or any order, license, or authorization issued thereunder. The EAR prohibits the ordering, buying, removing, concealing, storing, use, sale, loan, disposition,

transfer, transport, financing, forwarding, or other servicing, in whole or in part, of any item exported or to be exported from the United States, that is subject to the EAR, with knowledge that a violation of the EAR, or any order, license, or authorization issued thereunder, has occurred. *See* 15 C.F.R. § 764.2(a)-(e).

Iranian Entities

15. Mahan Air was an Iranian airline based in Tehran, Iran. Mahan Air operated multiple U.S.-origin aircraft. On March 17, 2008, the Department of Commerce, located within the District of Columbia, signed a Temporary Denial Order (“TDO”) denying Mahan Air's export privileges. The TDO broadly prohibits Mahan Air and/or other persons or companies acting for or on Mahan Air's behalf, directly or indirectly, from participating in any export transaction. This TDO has been successively renewed, the latest renewal of which occurred in January 2015. On October 12, 2011, OFAC added Mahan Air to the OFAC SDN list pursuant to Executive Order 13224 for providing financial, material and technological support to the Islamic Revolutionary Guard Corps-Qods Force (“IRGC-QF”). The SDN designation limits Mahan Air's ability to engage in U.S. dollar transactions, and prohibits any goods, technology, or services from being exported, reexported, sold or supplied, directly or indirectly, from the United States to a SDN.

16. Sahand Air was an Iranian airline based in Shiraz, Iran, and had an address in Tehran, Iran. Sahand Air operated two U.S.-origin aircraft, a McDonnell Douglas MD-82 and a McDonnell Douglas MD-83. Sahand Air was added to the BIS Entity List in August 2011.

17. Kish Air was an Iranian airline based in Kish Island, Iran. It had regularly scheduled flights into Imam Khomeini Airport in Tehran, Iran. Kish Air was added to the BIS Entity List in August 2011.

18. The conduct alleged in this Count began outside of the jurisdiction of any particular State or district, and later occurred within the District of Columbia and elsewhere, and is therefore within the venue of the United States District Court for the District of Columbia, as provided by Title 18, United States Code, Sections 3237(a) and 3238.

B. The Conspiracy

19. Beginning in or around December 2010 through in or about July 2012, within the District of Columbia and elsewhere, defendants **KRAL AVIATION**, and **PEYMAN AMIRI LARIJANI**, did knowingly combine, conspire, confederate and agree with others known and unknown to the Grand Jury, to commit offenses against the United States, and to defraud the United States, more particularly:

- A. to export and cause the export of aircraft parts and goods and to attempt to export and cause the export of aircraft parts and goods, from the United States to Iran in violation of the embargo imposed upon that country by the United States, without having first obtained the required licenses or authorizations from the OFAC, United States Department of the Treasury, located in the District of Columbia, in violation of Title 50, United States Code, Sections 1702 and 1705; and Title 31, Code of Federal Regulations, Part 560.203 through 560.205; and
- B. to defraud the Department of the Treasury and the Department of Commerce by interfering with and obstructing a lawful government function, that is, the enforcement of laws and regulations prohibiting the export or supply of goods from the United States to Iran and to restricted parties without authorization or a license, by deceit, craft, trickery, and

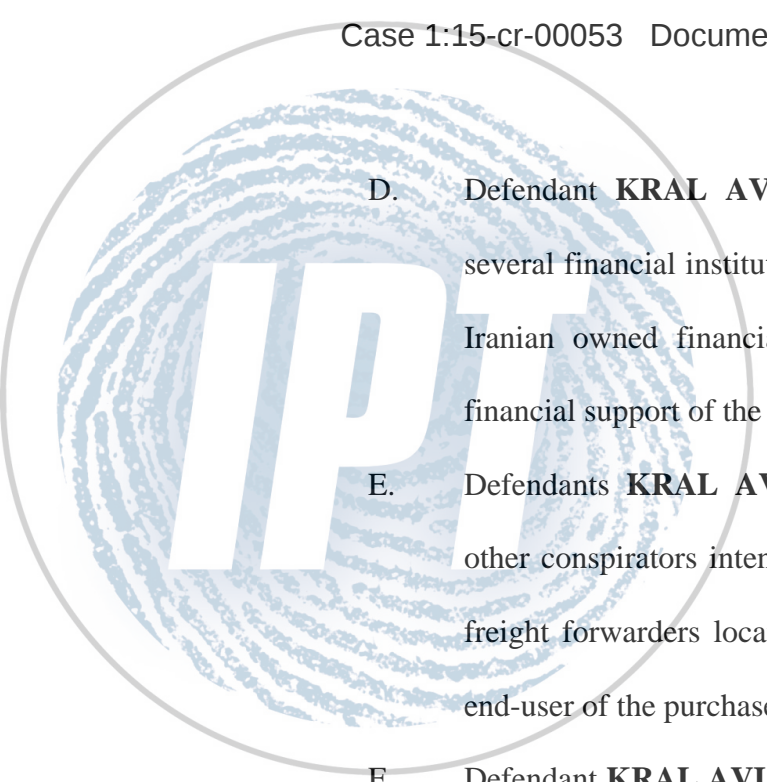
dishonest means, in violation of Title 18, United States Code, Section 371.

Objects of the Conspiracy

20. The objects of the conspiracy were:
- A. to acquire U.S.-origin aircraft parts and goods to supply to entities and end-users in Iran;
 - B. to conceal from United States companies and the United States government that the U.S.-origin goods were destined for Iranian end-users;
 - C. to make financial profit for defendants and other conspirators; and
 - D. to evade the regulations, prohibitions, and licensing requirements of the IEEPA, the ITR, and the EAR.

Manner and Means of the Conspiracy

21. The conspirators would and did use the following manner and means, among others, to accomplish the objects of the conspiracy:
- A. Defendant **KRAL AVIATION** and other conspirators sent requests for quotes for purchases of goods to companies located in the United States on behalf of other conspirators and customers in Iran.
 - B. Defendant **PEYMAN AMIRI LARIJANI** and other conspirators used e-mail accounts and other forms of communication to communicate with co-conspirators, and with individuals located in the United States and Iran.
 - C. Defendant **KRAL AVIATION** wired money from accounts outside of the United States to accounts of companies in the United States as payment for the purchased goods.



D. Defendant **KRAL AVIATION** maintained multiple bank accounts at several financial institutions located in Turkey, including an account at an Iranian owned financial institution designated by OFAC for material financial support of the Iranian nuclear program.

E. Defendants **KRAL AVIATION**, **PEYMAN AMIRI LARIJANI**, and other conspirators intentionally concealed from companies, shippers, and freight forwarders located in the United States the ultimate end-use and end-user of the purchased goods.

F. Defendant **KRAL AVIATION** and other conspirators caused shipment of goods to be made from the United States to Turkey before causing the goods to be re-exported to Iran.

G. Defendant **KRAL AVIATION** and other conspirators caused the goods to be exported from the United States to entities in Iran without obtaining a license or other authorization from the United States Department of the Treasury, Office of Foreign Assets Control, or the United States Department of Commerce, Bureau of Industry and Security.

Overt Acts

22. In furtherance of this conspiracy, and to accomplish its purposes and objects, at least one of the conspirators committed or cause to be committed, in the District of Columbia, and elsewhere, at least one of the following overt acts, among others:

(1) On or about December 29, 2010, **PEYMAN AMIRI LARIJANI**, acting on behalf of **KRAL AVIATION**, signed an end-user agreement with a United States company in which he falsely agreed that **KRAL**

AVIATION would not to sell or transfer U.S.-origin parts to a prohibited destination, namely Iran.

(2) On or about March 8, 2011, **PEYMAN AMIRI LARIJANI**, acting on behalf of **KRAL AVIATION**, signed an end-user agreement with a United States company in which he falsely agreed that **KRAL AVIATION** would not to sell or transfer U.S.-origin parts to a prohibited destination, namely Iran.

(3) On or about March 8, 2012, a representative of **KRAL AVIATION**, signed an end-user agreement with a United States company in which the representative falsely agreed that **KRAL AVIATION** would not to sell or transfer or export U.S.-origin parts to a prohibited destination, namely Iran.

(4) On or about June 28, 2012, a representative of **KRAL AVIATION**, signed an end-user agreement with a United States company in which the representative falsely agreed that **KRAL AVIATION** would not to sell or transfer U.S.-origin parts to a prohibited destination, namely Iran.

Window Assembly to Sahand Air

(5) On or about August 31, 2011, **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI** ordered one aircraft window assembly (part number 5964420-2) from Company A, a Florida-based exporter, valued at \$5,950.

(6) On or about September 6, 2011, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the window assembly from the United States to Turkey.

(7) On or about August 18, 2011, **KRAL AVIATION** caused a transfer of funds to Company A in the amount of \$6,000 from a Turkish-based financial institution as payment for the window assembly.

(8) Between September 9, 2011, and September 12, 2011, **KRAL AVIATION** issued an invoice to Sahand Talaiy Pars Trade Co. of Tehran, Iran, and caused the re-export of the window assembly from Turkey to Iran.

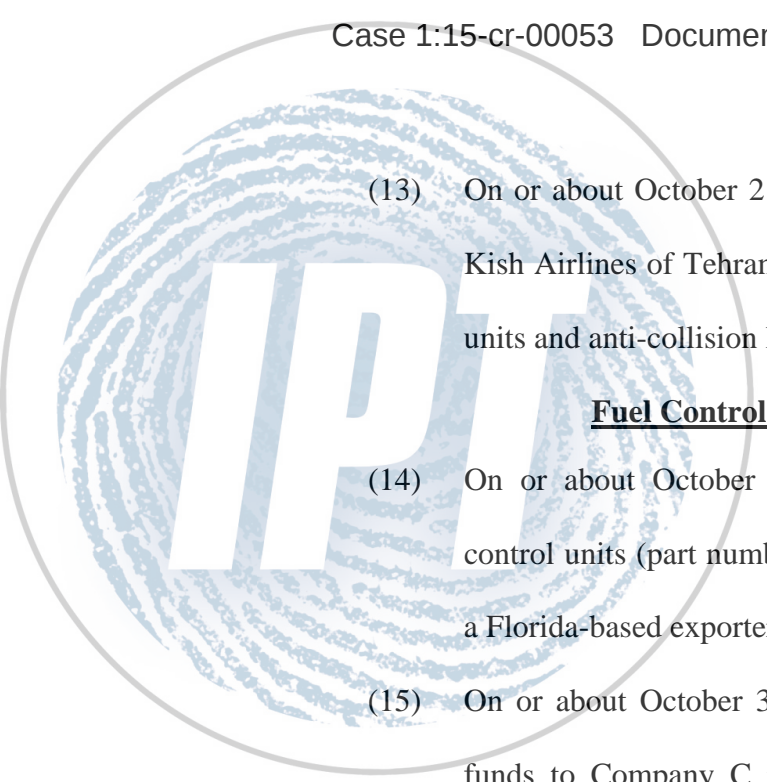
Fuel Control Units/Anti-Collision Lights to Kish Air

(9) On or about October 17, 2011, **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI** ordered two fuel control units (part number 769606-15) and two anti-collision lights (part number GE16720-010-2) from Company A, a Florida-based exporter, totaling \$29,000.

(10) On or about September 16, 2011, **KRAL AVIATION** caused a transfer of funds to Company A, a Florida-based exporter, in the amount of \$25,000 from a Turkish-based financial institution as payment for the fuel control units and anti-collision lights.

(11) On or about September 23, 2011, **KRAL AVIATION** caused a transfer of funds to Company A, a Florida-based exporter, in the amount of \$4,000 from a Turkish-based financial institution as payment for the fuel control units and anti-collision lights.

(12) On or about October 18, 2011, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the fuel control units and anti-collision lights from the United States to Turkey.

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- (13) On or about October 21, 2011, **KRAL AVIATION** issued an invoice to Kish Airlines of Tehran, Iran, and caused the re-export of the fuel control units and anti-collision lights from Turkey to Iran.

Fuel Control Units to Kish Air

- (14) On or about October 3, 2011, **KRAL AVIATION** ordered two fuel control units (part numbers 769606-15 and 769606-13) from Company C, a Florida-based exporter, totaling \$25,000.

- (15) On or about October 3, 2011, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$25,000 from a Turkish-based financial institution as payment for the fuel control units.

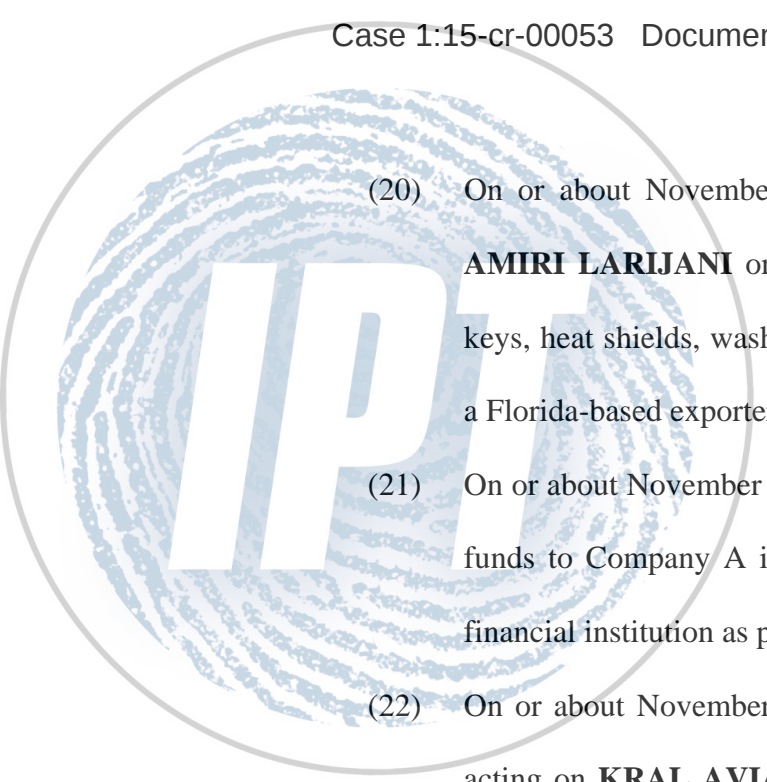
- (16) On or about October 26, 2011, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the fuel control units from the United States to Turkey.

- (17) On or about October 31, 2011, **KRAL AVIATION** issued an invoice to Kish Airlines of Tehran, Iran, and caused the re-export of the fuel control units from Turkey to Iran.

Various Aviation Parts to Kish Air

- (18) On or about November 4, 2011, **KRAL AVIATION** ordered 257 units of various civil aircraft items including keys, heat shields, spacers, baffles, seals, nuts, washers, bolts, caps, plugs, and other items from Company C, a Florida-based exporter, totaling \$22,724.50.

- (19) On or about November 10, 2011, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$22,684.50 from a Turkish-based financial institution as payment for the units.



(20) On or about November 22, 2011, **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI** ordered 50 civil aircraft items including disk drive keys, heat shields, washers, cup, and valve assemblies, from Company A, a Florida-based exporter, totaling \$4,320.70.

(21) On or about November 10, 2011, **KRAL AVIATION** caused a transfer of funds to Company A in the amount of \$6,726.20 from a Turkish-based financial institution as payment for the units.

(22) On or about November 23, 2011, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, consolidated the shipments and caused the export of both from the United States to Turkey.

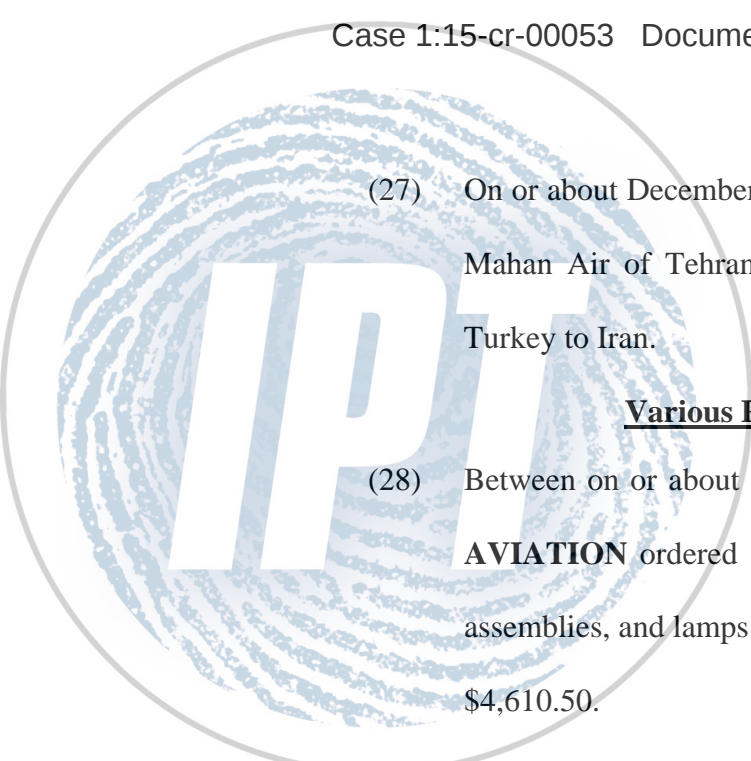
(23) On or about November 28, 2011, **KRAL AVIATION** issued an invoice to Kish Air of Tehran, Iran and caused the re-export of the units from Turkey to Iran.

Inertial Reference Units to Mahan Air

(24) On or about November 21, 2011, **KRAL AVIATION** and **PEYMANAMIRI LARIJANI** ordered two Inertial Reference Units (IRUs) from Company C, a Florida-based exporter, totaling \$55,000.

(25) On or about November 22, 2011, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$83,500, of which \$55,000 was designated as payment for the IRUs, from a Turkish-based financial institution.

(26) On or about December 8, 2011, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the IRUs from the United States to Turkey.



(27) On or about December 13, 2011, **KRAL AVIATION** issued an invoice to Mahan Air of Tehran, Iran and caused the re-export of the units from Turkey to Iran.

Various Parts to Kish Air

(28) Between on or about December 22, 2011, and January 11, 2012, **KRAL AVIATION** ordered 181 parts, including packing, filters, o-rings, valve assemblies, and lamps from Company C, a Florida-based exporter, totaling \$4,610.50.

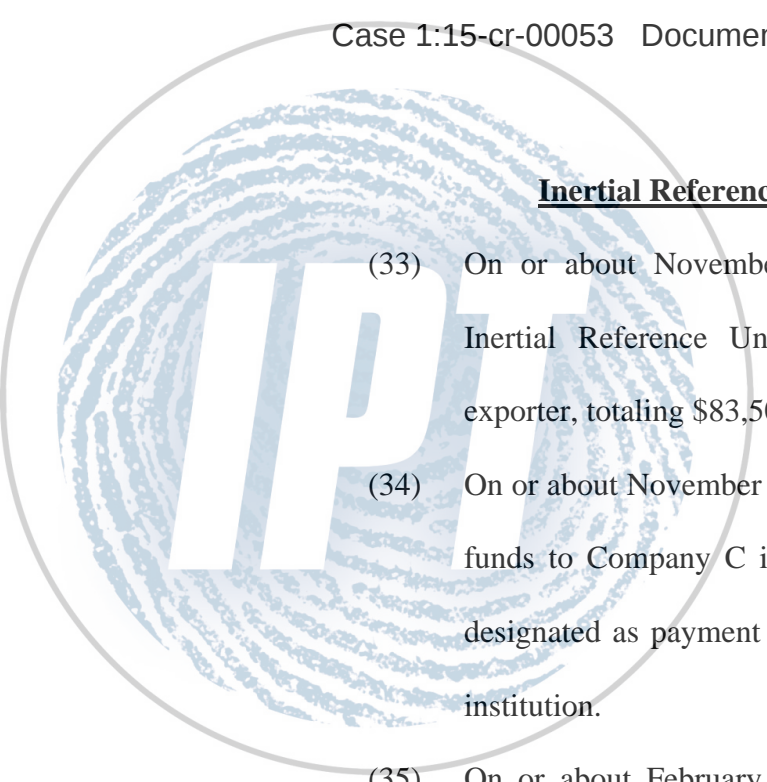
(29) On or about December 5, 2011, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$16,286.25 from a Turkish based financial institution in partial payment of the invoice for the parts ordered above.

(30) On or about April 24, 2012, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$50,000 from a Turkish based financial institution in partial payment of the invoice for the parts ordered above.

(31) On or about January 13, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the parts from the United States to Turkey.

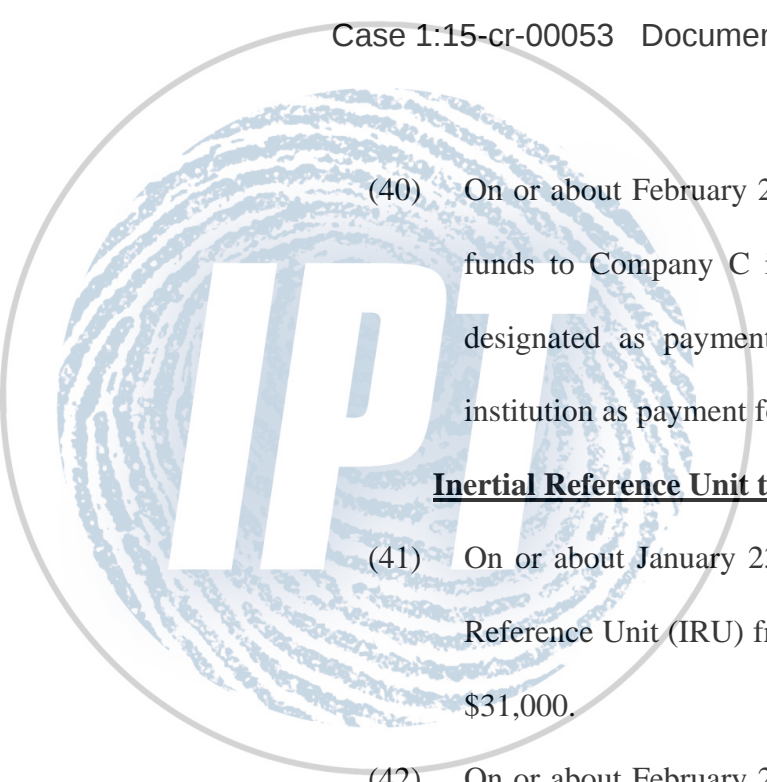
(32) On or about January 16, 2012, **KRAL AVIATION** issued an invoice to Kish Air of Tehran, Iran, and caused the re-export of the units from Turkey to Iran via Mahan Air.

Inertial Reference Units to Mahan Air

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- (33) On or about November 22, 2011, **KRAL AVIATION** ordered three Inertial Reference Units (IRUs) from Company C, a Florida-based exporter, totaling \$83,500.
- (34) On or about November 22, 2011, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$83,500, of which \$28,500 was designated as payment for the third IRU, from a Turkish-based financial institution.
- (35) On or about February 3, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the third IRU from the United States to Turkey.
- (36) On or about February 6, 2012, **KRAL AVIATION** issued an invoice to Mahan Air of Tehran, Iran, and caused the re-export of the unit from Turkey to Iran.

Inertial Navigation Units to Mahan Air

- (37) On or about February 6, 2012, **KRAL AVIATION** ordered four Inertial Navigation Units (INUs) from Company C, a Florida-based exporter, totaling \$9,600.
- (38) On or about February 7, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the INUs from the United States to Turkey.
- (39) On or about February 8-9, 2012, **KRAL AVIATION** issued an invoice to Mahan Air of Tehran, Iran, and caused the re-export of the INUs from Turkey to Iran.

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- (40) On or about February 23, 2012, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$60,000, of which \$9,600 was designated as payment for the INUs, from a Turkish-based financial institution as payment for the units.

Inertial Reference Unit to Mahan Air - March 7, 2012

- (41) On or about January 23, 2012, **KRAL AVIATION** ordered one Inertial Reference Unit (IRU) from Company C, a Florida-based exporter, totaling \$31,000.

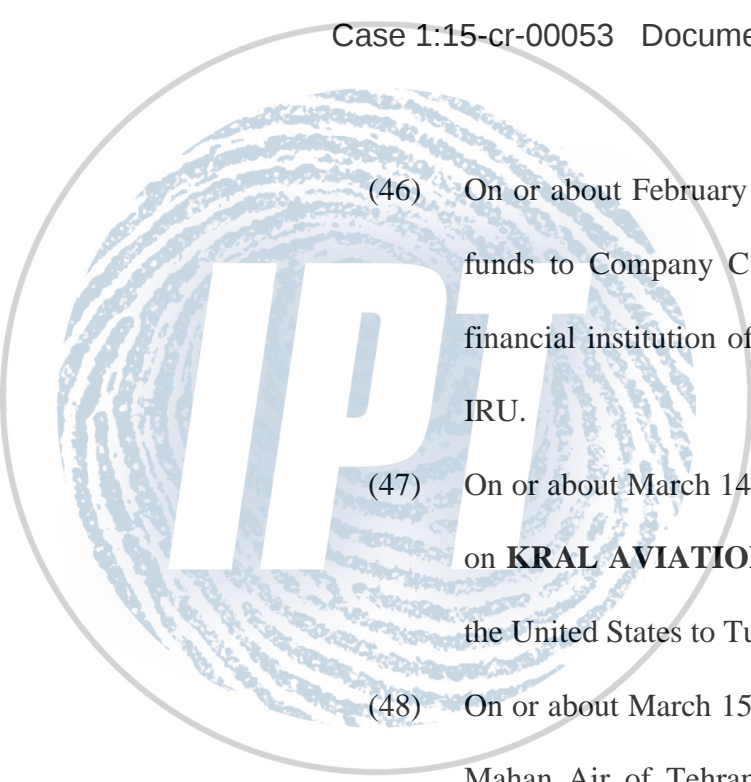
- (42) On or about February 23, 2012, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$60,000, from a Turkish-based financial institution of which \$31,000 was designated as payment for the IRU.

- (43) On or about March 7, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the IRU from the United States to Turkey.

- (44) On or about March 8-9, 2012, **KRAL AVIATION** issued an invoice to Mahan Air of Tehran, Iran, and caused the re-export of the unit from Turkey to Iran.

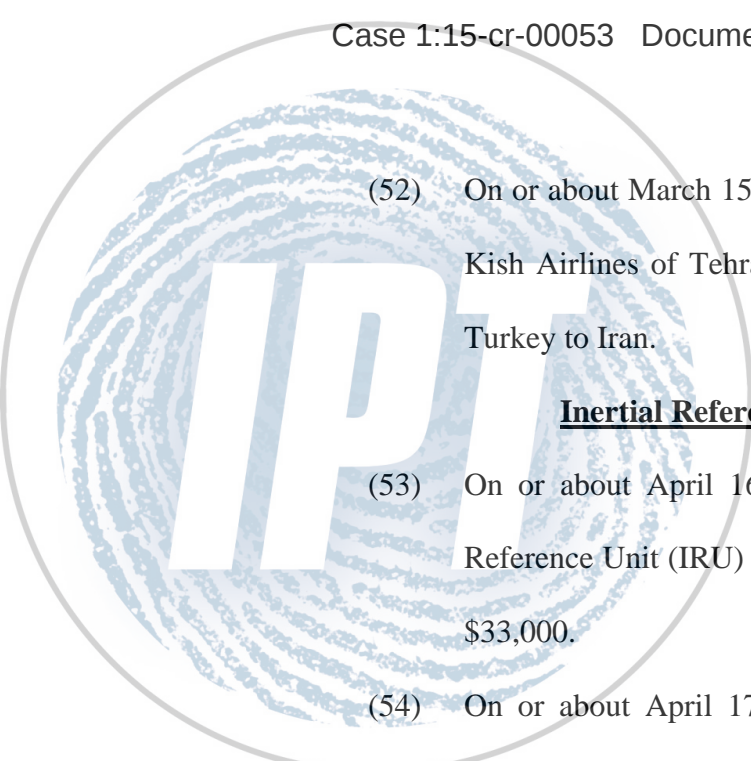
Inertial Reference Unit to Mahan Air - March 14, 2012

- (45) On or about January 23, 2012, **KRAL AVIATION** ordered one Inertial Reference Unit (IRU) from Company C, a Florida-based exporter, totaling \$31,000.

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- (46) On or about February 23, 2012, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$60,000, from a Turkish-based financial institution of which \$31,000 was designated as payment for the IRU.
- (47) On or about March 14, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the IRU from the United States to Turkey.
- (48) On or about March 15-18, 2012, **KRAL AVIATION** issued an invoice to Mahan Air of Tehran, Iran, and caused the re-export of the unit from Turkey to Iran.

Various Parts to Kish Air

- (49) On or about March 13, 2012, **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI** completed an order for 382 aircraft items, including screws, lamps, washers, rings, batteries, filters, and bolts from Company A, a Florida-based exporter, totaling \$2,200.70.
- (50) On or about December 2, 2011, **KRAL AVIATION** caused a transfer of funds to Company A, a Florida-based exporter, in the amount of \$7,000.70 from a Turkish-based financial institution as payment for the parts, among other purchases.
- (51) On or about March 14, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the parts from the United States to Turkey.



(52) On or about March 15-16, 2012, **KRAL AVIATION** issued an invoice to Kish Airlines of Tehran, Iran and caused the re-export of the parts from Turkey to Iran.

Inertial Reference Unit to Mahan Air

(53) On or about April 16, 2012, **KRAL AVIATION** ordered one Inertial Reference Unit (IRU) from Company C, a Florida-based exporter, totaling \$33,000.

(54) On or about April 17, 2012, **KRAL AVIATION** caused a transfer of funds to Company C in the amount of \$33,000 from a Turkish-based financial institution as payment for the IRU.

(55) On or about May 8, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the IRU from the United States to Turkey.

(56) On or about May 9-11, 2012, **KRAL AVIATION** issued an invoice to Mahan Air of Tehran, Iran, and caused the re-export of the unit from Turkey to Iran.

Seal Assemblies to Kish Air

(57) On or about June 15, 2012, **KRAL AVIATION** placed an order for five aircraft seal assemblies from Company A, a Florida-based exporter, totaling \$575.

(58) On or about May 30, 2012, **KRAL AVIATION** caused a transfer of funds to Company A in the amount of \$990.00 from a Turkish-based financial institution as payment for the five seal assemblies, among other purchases.

(59) On or about June 18, 2012, the parts were exported from the United States on Air France and delivered via MNG Airlines and FedEx Express to **KRAL AVIATION** in Turkey.

(60) On or about June 19-20, 2012, **KRAL AVIATION** issued an invoice to Kish Airlines of Tehran, Iran, and caused the re-export of the parts from Turkey to Iran.

Various Parts to Kish Air

(61) On or about May 30, 2012, **KRAL AVIATION** ordered 534 aircraft items, including relays, pitot heads, rivets, shim bands, and high speed tapes from Company C, a Florida-based exporter, totaling \$16,390.

(62) On or about May 30, 2012, **KRAL AVIATION** caused a transfer of funds to Company C, a Florida-based exporter, in the amount of \$16,390 from a Turkish-based financial institution as payment for the parts.

(63) On or about June 29, 2012, Company B, a U.S. freight forwarder, acting on **KRAL AVIATION**'s instructions, caused the export of the parts from the United States to Turkey.

(64) On or about July 2, 2012, **KRAL AVIATION** issued an invoice to Kish Airlines of Tehran, Iran, and caused the re-export of the parts from Turkey to Iran.

Failure to Obtain a License

(65) Defendants, **KRAL AVIATION**, **PEYMAN AMIRI LARIJANI**, and their conspirators failed to apply for, receive, or possess a license or authorization from the Office of Foreign Assets Control, United States

Department of the Treasury, located in the District of Columbia, and from the Department of Commerce, located in the District of Columbia, to export any of the goods and services set forth above from the United States to Iran.

(Conspiracy to Export U.S. Goods to Iran and to Defraud the United States and the U.S. Department of the Treasury, in violation of Title 50, United States Code, Section 1705; Title 31, Code of Federal Regulations, Sections 560.203 through 560.205; and Title 18, United States Code, Section 371)

COUNTS TWO THROUGH FIFTEEN

(Unlawful Exports and Attempted Exports to Embargoed Country)

23. The allegations in Paragraphs 1 through 19 of this Indictment are incorporated and re-alleged by reference herein.

24. On or about the dates listed as to each count below, in the District of Columbia, and elsewhere, defendants **KRAL AVIATION and PEYMAN AMIRI LARIJANI**, did knowingly and willfully violate the embargo against Iran by exporting and causing to be exported aircraft parts and other goods, and attempting to export and causing to be exported aircraft parts and other goods described more fully below from the United States to Iran without having first obtained the required authorizations from the Office of Foreign Assets Control, United States Department of the Treasury, located in the District of Columbia.

COUNT	APPROXIMATE EXPORT DATE	PART & PART NUMBER
TWO	September 6, 2011	Window assembly Part Number 5964420-2
THREE	October 18, 2011	Two (2) Anti- collision lights, Part Number GE 16720-010-2; Two (2) Fuel Control Units, Part Number 769606-15
FOUR	October 26, 2011	Two (2) Fuel Control Units, Part Numbers 769606-15 and 769606-13

FIVE	November 23, 2011	Two hundred and fifty seven (257) various civil aircraft parts, including keys, heat shields, spacers, baffles, seals, nuts, washers, bolts, caps, plugs; Fifty (50) disk drives, heat shields, washers, cups, and valve assemblies
SIX	December 8, 2011	Two (2) Inertial Reference Units, Part Number 461800-03002203
SEVEN	January 13, 2012	One hundred and eighty-one (181) various parts including a valve assembly, Part Number 5918161-5505; Packing material, filters, O-rings, Part Number S9413-227, 74896, S8990-018, AS3209-236, AS3209-131, S8990-115; Five (5) lamps, Part Number 36367-4; Ten (10) filters, Part Number 3036376; Packing material, Part Number MS9385-10
EIGHT	February 3, 2012	Three (3) Inertial Reference Units, Part Number 461800-03002203
NINE	February 7, 2012	Four (4) Inertial Navigation Units, Part Number 7890860-011
TEN	March 7, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
ELEVEN	March 14, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
TWELVE	March 14, 2012	Three hundred and eighty-two (382) various civil aircraft screws, lamps, washers, rings, batteries, filters, bolts, and other assorted items, Part Numbers: NAS1096-3-15, NAS1096-3-8,1864, NAS1149F0332P, Q4559X, 4551, AS3209-236, 4594, MISC060, 7578137-101, 3059777-01, M83248-1-014, AS3578-222, NAS1581F3T3 and NAS1580A4T6
THIRTEEN	May 8, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
FOURTEEN	June 18, 2012	Five (5) Seal assemblies, Part Number 743J9MT-987-N
FIFTEEN	June 29, 2012	Five hundred and thirty four (534) items including Two (2) relays, Part Number 5D0282-1; One (1) relay, Part Number MF88C1R4-10A; Five hundred (500) rivets, Part Number FON2-6840-6A08), One (1) pivot head, Part Number 0856PD3; Twenty (20) shim bands, Part Number 660710939; and Ten (10) high speed tapes, Part Number SCOTCH425

(Unlawful Exports and Attempted Exports to Embargoed Country, in violation of Title 50, United States Code, Sections 1702 and 1705; Title 31, Code of Federal Regulations, Sections

560.203, 560.204 and 560.205; and Title 18, United States Code, Section 2)

COUNT SIXTEEN TO TWENTY

(Unlawful Export and Attempted Export of Restricted Commodities)

25. The allegations in Paragraphs 1 through 19 of this Indictment are incorporated and re-alleged by reference herein.

26. On or about the dates listed as to each count below, in the District of Columbia, and elsewhere, defendants **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI**, did knowingly and willfully export and cause to be exported and attempt to export Inertial Reference Units to Turkey from the United States without having first obtained the required authorizations and licenses from the United States Department of Commerce, Bureau of Industry and Security, located in the District of Columbia.

COUNT	APPROXIMATE DATE	PART & PART NUMBER
SIXTEEN	December 8, 2011	Two (2) Inertial Reference Units, Part Number 461800-03002203
SEVENTEEN	February 3, 2012	Three (3) Inertial Reference Units, Part Number 461800-03002203
EIGHTEEN	March 7, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
NINETEEN	March 14, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
TWENTY	May 8, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203

(Unlawful Export and Attempted Export of Restricted Commodities, in violation of Title 50, United States Code, Sections 1702 and 1705; Title 15, Code of Federal Regulations, Section 764.2(a); and Title 18, United States Code, Section 2)

COUNTS TWENTY ONE TO TWENTY FIVE

(Willful Violation of a Denial Order)

27. The allegations in Paragraphs 1 through 19 of this Indictment are incorporated and re-alleged by reference herein.

28. On or about the dates listed as to each count below, in the District of Columbia, and elsewhere, defendants **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI**, willfully violated a denial order issued by the Department of Commerce, located in the District of Columbia, by carrying on negotiations with others on behalf of a prohibited entity in Iran, namely Mahan Air, concerning the buying, receiving, using, selling, and delivering of the following aviation parts, which were U.S.-origin commodities subject to the Export Administration Regulations.

COUNT	APPROXIMATE DATE	PART & PART NUMBER
TWENTY ONE	December 8, 2011	Two (2) Inertial Reference Units, Part Number 461800-03002203
TWENTY TWO	February 3, 2012	Three (3) Inertial Reference Units, Part Number 461800-03002203
TWENTY THREE	March 7, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
TWENTY FOUR	March 14, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203
TWENTY FIVE	May 8, 2012	One (1) Inertial Reference Unit, Part Number 461800-03002203

(**Willful Violation of Denial Order**, in violation of Title 50, United States Code, Section 1705; and Title 15, Code of Federal Regulations, Sections 764.2(a), (b), (k); **Aiding and Abetting and Causing an Act to be Done**, in violation of Title 18, United States Code, Section 2.)

COUNT TWENTY SIX

(Unlawful Export and Attempted Export to a Prohibited Entity)

29. The allegations in Paragraphs 1 through 19 of this Indictment are incorporated and re-alleged by reference herein.

30. On or about September 6, 2011, in the District of Columbia, and elsewhere, defendants **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI**, did knowingly and willfully export and cause to be exported and attempt to export one Window Assembly; part number 5964420-2, which is a U.S.-origin commodity subject to the Export Administration

Regulations, to a prohibited entity in Iran, namely Sahand Air, from the United States without having first obtained the required authorizations and licenses from the United States Department of Commerce, Bureau of Industry and Security, located in the District of Columbia.

(Unlawful Export and Attempted Export to a Prohibited Entity, in violation of Title 50, United States Code, Section 1705; Executive Order 13222; Title 15, Code of Federal Regulations, Supplement 4 to Part 744 and Section 764.2; Aiding and Abetting and Causing an Act to Be Done, in violation of Title 18, United States Code, Section 2.)

COUNT TWENTY SEVEN TO THIRTY THREE

(Unlawful Export and Attempted Export to a Prohibited Entity)

31. The allegations in Paragraphs 1 through 19 of this Indictment are incorporated and re-alleged by reference herein.

32. On or about the dates listed as to each count below, in the District of Columbia, and elsewhere, defendants **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI**, did knowingly and willfully export and cause to be exported and attempt to export the following aviation parts, which were U.S.-origin commodities subject to the Export Administration Regulations, to A prohibited entity in Iran, namely Kish Air, from the United States without having first obtained the required authorizations and licenses from the United States Department of Commerce, Bureau of Industry and Security, located in the District of Columbia.

COUNT	APPROXIMATE EXPORT DATE	PART & PART NUMBER
TWENTY SEVEN	October 18, 2011	Two (2) Anti- collision lights, Part Number GE 16720-010-2; Two (2) Fuel Control Units, Part Number 769606-15
TWENTY EIGHT	October 26, 2011	Two (2) Fuel Control Units, Part Numbers 769606-15 and 769606-13

TWENTY NINE	November 23, 2011	Two hundred and fifty seven (257) various civil aircraft parts, including keys, heat shields, spacers, baffles, seals, nuts, washers, bolts, caps, plugs; Fifty (50) disk drives, heat shields, washers, cups, and valve assemblies
THIRTY	January 13, 2012	One hundred and eighty-one (181) various parts including a valve assembly, Part Number 5918161-5505; Packing material, filters, O-rings, Part Number S9413-227, 74896, S8990-018, AS3209-236, AS3209-131, S8990-115; Five (5) lamps, Part Number 36367-4; Ten (10) filters, Part Number 3036376; Packing material, Part Number MS9385-10
THIRTY ONE	March 14, 2012	Three hundred and eighty-two (382) various civil aircraft screws, lamps, washers, rings, batteries, filters, bolts, and other assorted items, Part Numbers: NAS1096-3-15, NAS1096-3-8, 1864, NAS1149F0332P, Q4559X, 4551, AS3209-236, 4594, MISC060, 7578137-101, 3059777-01, M83248-1-014, AS3578-222, NAS1581F3T3 and NAS1580A4T6
THIRTY TWO	June 18, 2012	Five (5) Seal assemblies, Part Number 743J9MT-987-N
THIRTY THREE	June 29, 2012	Five hundred and thirty four (534) items including Two (2) relays, Part Number 5D0282-1; One (1) relay, Part Number MF88C1R4-10A; Five hundred (500) rivets, Part Number FON2-6840-6A08); One (1) pivot head, Part Number 0856PD3; Twenty (20) shim bands, Part Number 660710939; and Ten (10) high speed tapes, Part Number SCOTCH425

(Unlawful Export and Attempted Export to a Prohibited Entity, in violation of Title 50, United States Code, Section 1705; Executive Order 13222; Title 15, Code of Federal Regulations, Supplement 4 to Part 744 and Section 764.2; Aiding and Abetting and Causing an Act to Be Done, in violation of Title 18, United States Code, Section 2.)

COUNT THIRTY FOUR

(Conspiracy to Commit Money Laundering)

33. The allegations in Paragraphs 1 through 19 of this Indictment are incorporated and re-alleged by reference herein.

34. Beginning as early as in or around December 2010, the exact date being unknown

to the Grand Jury, and continuing through at least July 2012, within the District of Columbia and elsewhere, the defendants, **KRAL AVIATION** and **PEYMAN AMIRI LARIJANI**, did knowingly and willfully combine, conspire, confederate and agree together and with other persons both known and unknown to the Grand Jury, to violate:

Title 18, United States Code, Section 1956(a)(2)(A), that is, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer, funds, to a place in the United States from and through a place outside the United States, that is Turkey, with the intent to promote the carrying on of specified unlawful activity, to wit, an offense relating to violations of the Export Administration Act of 1979, and the International Emergency Economic Powers Act; and

Title 18, United States Code, Section 1956(a)(2)(B)(i), that is, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer, funds, to a place in the United States from and through a place outside the United States, that is Turkey, knowing that these funds represented the proceeds of some form of unlawful activity, to wit, an offense relating to violations of the Export Administration Act of 1979, and the International Emergency Economic Powers Act, and knowing that the transportation, transmission, and transfer were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity;

all in violation of Title 18, United States Code, Section 1956(h).

(Conspiracy to Commit Money Laundering, in violation of Title 18, United States Code, Section 1956)

FORFEITURE ALLEGATION

35. Upon conviction of the offenses alleged in Counts One through Thirty Four of this Indictment, defendant shall forfeit to the United States any property, real or personal, which constitutes, or is derived from proceeds traceable to the this offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The property subject to forfeiture includes a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, which constitutes, or is derived from proceeds traceable to the this offense.

36. Upon conviction of the offense alleged in Count Thirty Four of this Indictment, defendant shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property pursuant to Title 18, United States Code, Section 982(a)(1). The property subject to forfeiture includes a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, involved in the violation, and any property traceable to such property.

37. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the Court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 982(a)(1), and Title 21, United States Code, Section 853(p)).

A TRUE BILL

FOREPERSON

Attorney of the United States in
and for the District of Columbia